



U.S. Department of Justice

United States Attorney
Southern District of New York

MAR 21 2008

86 Chambers Street, 3rd Floor
New York, New York 10007CHAMBERS OF
DEBORAH A. BATTS
U.S.D.J.

March 28, 2008

BY HAND

The Honorable Deborah A. Batts
United States District Judge
United States Courthouse
500 Pearl Street, Room 2510
New York, New York 10007

MEMO ENDORSED

Re: Berroa v. United States, 07 Civ. 3521 (DAB)

Dear Judge Batts:

MEMO ENDORSED

I write on behalf of both parties in the above-referenced medical malpractice action respectfully to request a 30-day extension of the deadline for the close of discovery in this case.

Discovery in this case is scheduled to close on March 31, 2008. The parties respectfully request an extension of the discovery deadline until April 30, 2008 because expert discovery regarding plaintiffs' injuries has not yet been completed. Plaintiff Jessyca Berroa was noticed for a physical examination on February 5, 2008. Ms. Berroa was not able to appear on that date, and the examination was subsequently rescheduled to March 25, 2008. This Office was notified on March 25 that Ms. Berroa would not be able to appear for the examination at the scheduled time due to traveling difficulties. A rescheduled examination has now been set for April 2, 2008. The parties therefore respectfully request an extension of the discovery deadline for this examination to proceed on April 2, for the parties to conduct expert depositions, and to resolve any outstanding discovery issues.

GRANTED
/DAB/

MEMO ENDORSED

SO ORDERED

DEBORAH A. BATTS
UNITED STATES DISTRICT JUDGE

31 Mar 08

MEMO ENDORSED